REMARKS

This Application has been carefully reviewed in light of the Office Action mailed August 27, 2001. At the time of the Office Action, Claims 17-45 were pending in this patent application. The Examiner objected to Claims 18 and 32 and rejected Claims 17, 19-31, 33-45. Thus, Claims 17-45 are now pending in the Application. Applicants respectfully request reconsideration and favorable action in this case.

Allowable Claims

Applicants thank the Examiner for the indication that Claims 18 and 32 would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Applicants respectfully defer rewriting of these Claims until the Examiner has considered the following arguments.

Section 103 Rejection

Claims 17, 19-31, and 33-45 stand rejected under 35 U.S.C. §103(a) as being unpatentable over *Rogers, et al.*, U.S. Pat. No. 5,752,246 ("Rogers"), in view of *Malcolm*, U.S. Pat. No. 5,701,463 ("Malcolm"). Applicants respectfully traverse this rejection for at least the following reasons.

Claim 17 recites, in part, "routing a request from a Web server to a page server". The Examiner admits that Rogers does not teach these elements of Claim 17. Office Action, p. 3. The Examiner relies solely on Malcolm to teach these elements of Claim 17. Office Action, p. 3. Malcolm involves intercepting a file open request at the operating system level and determining whether the identity of the file to be opened should be replaced with the identity of a substitute file to be opened instead. Malcolm, Abstract. Malcolm further notes that whether to permit execution of a file is implemented at the file server by a controlling utility. Malcolm, col. 4, lines 57-59. Malcolm's interception of a file open request and determination of whether to permit execution of a file does not teach or suggest "routing a request from a Web server to a page server" because mere interception and determination do not teach or suggest "routing" the request from one place to another.

Claim 17 further recites, in part, "processing said request, said processing being performed by said page server while said Web server concurrently processes said other requests" and "said page server receiving said request and releasing said Web server to process other requests". Neither Rogers nor Malcolm, either alone or in combination, teach or suggest

these elements of Claim 17. Rogers involves organizing distributed sub-agents as distributed integration solution servers to support a web server. Rogers, Abstract. Rogers also discusses a means for accepting web client requests for information, obtaining data from one or more databases and presenting that information to the web client. Rogers, col. 5, lines 54-61. At no time does Rogers teach or suggest "concurrently" processing other requests or "releasing said Web server to process other requests" because merely retrieving data from multiple sources does not teach or suggest these elements.

In addition, there is no motivation to combine Rogers and Malcolm. Malcolm involves intercepting file open requests at an operating system level to determine whether a substitute file should be opened instead of the original file. Rogers involves a distributed integration solution associated with web servers. Rogers, Abstract. No motivation exists to combine the web server functionality of Rogers with the operating system level functionality of Malcolm. Also, as Rogers is completely unconcerned with dealing with substitute file names, Applicants respectfully submit that the Examiner has made use of impermissible hindsight based on Applicants' disclosure when combining Rogers and Malcolm.

Therefore, for at least these reasons, Claim 17 is patentable over the cited references, either alone or in combination. Thus, Applicants respectfully request allowance of Claim 17.

Independent Claims 31 and 45 are patentable for at least the reasons discussed above in association with independent Claim 17. Thus, Applicants respectfully request allowance of independent Claims 31 and 45.

Dependent Claims 19-30 depend from independent Claim 17, and dependent Claims 33-44 depend from independent Claim 31. Independent Claims 17 and 31 are shown above to be allowable. Therefore, Claims 19-30 and 33-44 are allowable as depending from an allowable base claim and as defining further distinctions over the cited references. Thus, Applicants respectfully request allowance of Claims 19-30 and 33-44.

In particular, dependent Claim 21 recites, in part, "maintaining a connection cache to said one or more data sources" and Claim 23 recites, in part, "maintaining a page cache containing said Web page". The Examiner states that the elements of Claims 21 and 23 are inherent in Rogers. Office Action, p. 4. Rogers does not involve either a connection cache or a page cache. Applicants respectfully submit that neither a connection cache nor a page cache are inherent in Rogers. Applicants respectfully request that the Examiner indicate some teaching or suggestion of Rogers with respect to a page cache and a connection cache. Therefore, Claims

21 and 23 are patentable over Rogers. Thus, Applicants respectfully request allowance of Claims 21 and 23.

Also, Claim 24 recites "wherein said page server includes tag-based text templates for configuring said Web page." Applicants respectfully submit that Rogers does not teach or suggest this element of Claim 24. In contrast to the Examiner's assertion, Rogers merely teaches that data flows between a web server and a decision support system tool and that formatted report results are provided to a web browser. See Rogers, col. 11, lines 64-65 and col. 12, lines 18-24. Mere retrieval and formatting of data does not teach or suggest a "tag-based text template for configuring said Web page". Therefore, Claim 24 is patentable over Rogers. Thus, Applicants respectfully request allowance of Claim 24.

Dependent Claims 35, 37 and 38 are also patentable for at least the reasons discussed above in association with Claims 21, 23 and 24. Thus, Applicants respectfully request allowance of Claims 35, 37 and 38.
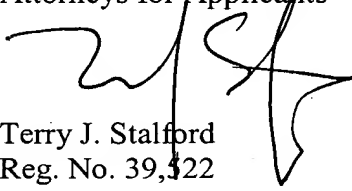
CONCLUSION

Applicants have now made an earnest attempt to place this case in condition for immediate allowance. For the foregoing reasons and for other reasons clearly apparent, Applicants respectfully request reconsideration and allowance of Claims 17-45.

Although Applicants believe that no other fees are due, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

If there are matters that can be discussed by telephone to further the prosecution of this application, Applicants respectfully request that the Examiner call its attorney at the number listed below.

Respectfully submitted,
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